

1 THE HONORABLE ROBERT S. LASNIK

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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 CITY OF SEATTLE, a municipal
10 corporation, located in the County of King,
State of Washington,

11 Plaintiff,

12 v.

13 MONSANTO COMPANY, SOLUTIA INC.,
14 and PHARMACIA CORPORATION, and
DOES 1 through 100,

15 Defendants.

Case No. 2:16-CV-00107-RSL

STIPULATED MOTION TO STAY THE
CASE

16 Plaintiff and Defendants file this stipulated motion requesting that the Court stay this
17 case until April 24, 2020 and vacate the currently scheduled deadlines. The City cannot
18 prosecute this complex case without outside counsel. The City is working diligently to retain
19 new counsel but, in the meantime, the City is unable to respond to discovery requests because
20 the City lacks access to the documents it has already produced. Without access to its
21 documents, the City cannot prepare witnesses for depositions and cannot identify whether
22 documents still need to be produced. The City also cannot finalize expert reports. Thus, the
23 court's recent extension of the trial schedule does not provide the relief that the City needs.

24 The Parties agree that the trial schedule will need further modification after the City
25 has new counsel, because once new counsel is retained, it will take some time for new counsel
26 to get up to speed on this case. The Parties have agreed to conduct three fact witness

STIPULATED MOTION TO STAY CASE- 1

SCHWABE, WILLIAMSON & WYATT, P.C.
Attorneys at Law
1420 5th Avenue, Suite 3400
Seattle, WA 98101-4010
Telephone: 206.622.1711

1 depositions during the stay, and they will work cooperatively in scheduling those depositions.
2 On or before April 24, 2020, the Parties will confer and propose a modification to the trial
3 schedule. They agree that the schedule they will propose will provide for Defendants to
4 complete a 30(b)(6) deposition of the Plaintiff at least thirty days before the deadline for
5 exchange of expert reports.

6 Dated this 11th day of March, 2020

7 PETER S. HOLMES
8 Seattle City Attorney

9
10 By: /s/ Laura B. Wishik
11 Peter S. Holmes, WSBA #15787
12 Laura B. Wishik, WSBA # 16682
13 *Attorneys for Plaintiff*

14 **SEATTLE CITY ATTORNEY'S OFFICE**
15 701 Fifth Avenue, Suite 2050
16 Seattle, WA 98104
17 Telephone: (206) 684-8200
18 *Attorneys for Plaintiff*

19 SCHWABE, WILLIAMSON & WYATT,
20 P.C.

21 By: /s/ Jennifer L. Campbell
22 Jennifer L. Campbell, WSBA No. 31703
23 Email: jcampbell@schwabe.com
24 Connie Sue M. Martin, WSBA No.
25 26525
26 Email: csmartin@schwabe.com
1420 5th Avenue, Suite 3400
Seattle, WA 98101
Telephone: (206) 622-1711
Fax: (206) 292-0460
*Attorneys for Defendants, Monsanto
Company, Solutia Inc., and Pharmacia
Corporation*

STIPULATED MOTION TO STAY CASE- 2

SCHWABE, WILLIAMSON & WYATT, P.C.
Attorneys at Law
1420 5th Avenue, Suite 3400
Seattle, WA 98101-4010
Telephone: 206.622.1711

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CAPES SOKOL

By: /s/ Adam E. Miller

Adam E. Miller, Bar No. 40945

Email: miller@capessokol.com

Lisa N. DeBord, Bar No. 61658

Email: debord@capessokol.com

7701 Forsyth Boulevard, 12th Floor

St. Louis, MO 63105

*Attorneys Admitted Pro Hac Vice for
Defendants, Monsanto Company, Solutia
Inc., and Pharmacia Corporation*

LATHAM & WATKINS LLP

By: /s/ Robert M. Howard

Robert M. Howard, CSBA No. 145870

Email: robert.howard@lw.com

Kelly E. Richardson, CSBA No. 210511

Email: kelly.richardson@lw.com

12670 High Bluff Drive

San Diego, CA 92130

*Attorneys Admitted Pro Hac Vice for
Defendants, Monsanto Company, Solutia
Inc., and Pharmacia Corporation*

KING & SPALDING LLP

By: /s/ Donald F. Zimmer

Donald F. Zimmer, CSBA No. 34371

Email: FZimmer@kslaw.com

Nicholas D. Kayhan, CSBA No. 129878

Email: NKayhan@kslaw.com

Megan Nishikawa, CSBA No. 271670

Email: MNishikawa@kslaw.com

101 Second Street, Suite 2300

San Francisco, CA 94105

*Attorneys Admitted Pro Hac Vice for
Defendants, Monsanto Company, Solutia
Inc., and Pharmacia Corporation*

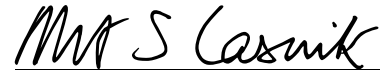
STIPULATED MOTION TO STAY CASE- 3

SCHWABE, WILLIAMSON & WYATT, P.C.
Attorneys at Law
1420 5th Avenue, Suite 3400
Seattle, WA 98101-4010
Telephone: 206.622.1711

ORDER

It is so ordered.

Dated this 16th day of March, 2020.


Robert S. Lasnik
United States District Judge

STIPULATED MOTION TO STAY CASE- 4

SCHWABE, WILLIAMSON & WYATT, P.C.
Attorneys at Law
1420 5th Avenue, Suite 3400
Seattle, WA 98101-4010
Telephone: 206.622.1711